

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

M. DIANE KOKEN, in her official capacity as
Insurance Commissioner of the Commonwealth
of Pennsylvania, as Liquidator of RELIANCE
INSURANCE COMPANY (IN LIQUIDATION)
1311 Strawberry Square
Harrisburg, Pennsylvania 17120

Plaintiff,

-v-

GPC INTERNATIONAL, INC.

Defendant.

No. 05 CV 223 (SLR)

GPC INTERNATIONAL, INC.

Third-Party Plaintiff

-v-

ZURICH-AMERICAN INSURANCE
COMPANY

Third-Party Defendant.

**GPC INTERNATIONAL, INC.'S
MOTION FOR LEAVE TO FILE AN AMENDED ANSWER**

Pursuant to Fed. R. Civ. P. 15(a), Defendant and Third-Party Plaintiff GPC International, Inc. ("GPC"), by and through its undersigned counsel, hereby moves for an Order, in the form attached hereto, for leave to file an amended answer to the complaint.

The grounds for GPC's motion are fully set forth in the accompanying memorandum of law.

BOUCHARD MARGULES & FRIEDLANDER, P.A.

Of Counsel:

Herbert C. Ross, Esquire
Lori Marks-Esterman, Esquire
OLSHAN GRUNDMAN FROME
ROSENZWEIG & WOLOSKY LLP
Park Avenue Tower
65 East 55th Street
New York, NY 10022

By /s/ John M Seaman

Andre G. Bouchard (#2504)
John M. Seaman (#3868)
222 Delaware Ave, Suite 1400
Wilmington, DE 19801
Telephone: (302) 573-3500
abouchard@bmf-law.com
jseaman@bmf-law.com

Dated: April 13, 2006

Attorneys for Defendant GPC International, Inc.